

GEO LOGIC CORPORATION

Geo Logic Corporation
P. O. Box 1341
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485274-00

908.233.1315 V
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June 24, 2011

Mr. José Gayoso, Chemical Review Manager
Document Processing Desk S4400
(DCI/PRD)
Office of Pesticide Programs (7508P)
U.S. Environmental Protection Agency
2775 South Crystal Drive
Arlington, VA 22202

**Re: Oxytetracycline, Case# 0655, Chemical # 006308 Oxytetracycline hydrochloride,
ID# GDCI-006308-28549**

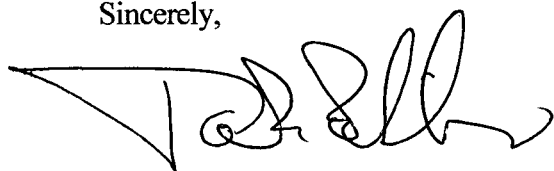
Dear Mr. Gayoso:

The purpose of this letter is to notify the United States Environmental Protection Agency (EPA) that Geo Logic Corporation (Geo Logic) as registrant for oxytetracycline hydrochloride is, in compliance with actions specified in the generic Data Call-In notice issued for oxytetracycline on June 23, 2010, hereby submitting waiver requests for oxytetracycline hydrochloride study requirements shown in the table below:

Guideline Study Requirement Number	Study Title
850.5400	Algal toxicity, Tiers I and II
850.4400	Aquatic plant toxicity test using <i>Lemna</i> spp. Tiers I and II
850.1035	Mysid acute toxicity test
850.2100	Avian acute oral toxicity test
850.2200	Avian dietary toxicity test
850.3020	Honey bee acute contact toxicity
870.7800	Immunotoxicity
850.1300	Daphnid chronic toxicity test

Based on a careful and thorough review of published scientific literature, Geo Logic has prepared written requests for waivers for the above listed studies for oxytetracycline. These documents are enclosed with this cover letter.

Sincerely,

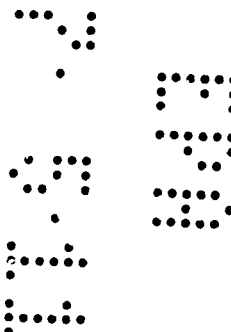


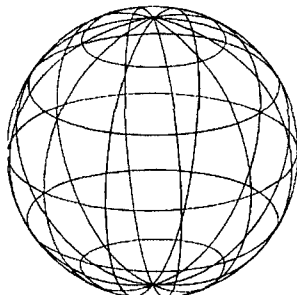
Taw W. Richardson, President

cc: Dr. Don Carlson, Regulatory Affairs Representative for Geo Logic Corporation

Enclosures:

- 48527401** 1. ASI-200: Geo Logic Corporation Position Paper Regarding Algal Plant Toxicity, Tier II, Geo Logic Report ID: ASI-200-01-11
- 48527402** 2. ASI 200: Geo Logic Corporation Position Paper Regarding Aquatic Plant Toxicity, Tier II, Geo Logic Report ID: ASI-200-02-11
- 48527403** 3. ASI 200: Geo Logic Corporation Position Paper Regarding Mysid Shrimp Acute Toxicity, Geo Logic Report ID: ASI-200-03-11
- 48527404** 4. ASI 200: Geo Logic Corporation Position Paper Regarding Avian Acute Oral and Dietary Toxicity, Geo Logic Report ID: ASI-200-04-11
- 48527405** 5. ASI 200: Geo Logic Corporation Position Paper Regarding Immunotoxicity, Geo Logic Report ID: ASI-200-05-11
- 48527406** 6. ASI 200: Geo Logic Corporation Position Paper Regarding Honey Bee Acute Contact Toxicity, Geo Logic Report ID: ASI-200-06-11
- 48527407** 7. ASI 200: Geo Logic Corporation Position Paper Regarding Freshwater Invertebrate Life Cycle, Geo Logic Report ID: ASI-200-07-11





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**Re: Oxytetracycline, Case# 0655, Chemical # 006308 Oxytetracycline hydrochloride,
ID# GDCI-006308-28549**

Dear Mr. Gayoso:

The purpose of this letter is to notify the United States Environmental Protection Agency (EPA) how Geo Logic Corporation, as a registrant for oxytetracycline hydrochloride, intends to meet to certain data requirement as specified in the generic Data Call-In notice for oxytetracycline issued June 23, 2010. The data requirements to which this letter pertains are listed in the table below.

Guideline Study Requirement Number	Study Title
850.4100	Terrestrial plant toxicity, Tier I (seedling emergence)
850.4150	Terrestrial plant toxicity, Tier I (vegetative vigor)
850.1025	Oyster acute toxicity test (shell deposition)
850.1075	Fish acute toxicity test, freshwater and marine
850.1400	Fish early-life stage toxicity test

On October 17, 2008, Geo Logic Corporation put forth an irrevocable offer to cost share with the other registrant of oxytetracycline (Nufarm Americas, Inc) to meet the data requirements associated with the re-registration of oxytetracycline. This "offer-to-pay" letter (on file with the EPA) represents the basis from which Geo Logic Corporation will meet the data requirement specified in the above table for oxytetracycline.

Sincerely,

Taw W. Richardson, President

cc: Dr. Don Carlson, Regulatory Affairs Representative for Geo Logic Corporation

